

EXHIBIT

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to:	15-cv-9903 (GBD) (SN)
<i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	ECF Case

DECLARATION OF PRAKASH BHATT

I, Prakash Bhatt, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today.

Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at the World Trade Center Towers when the terrorist attacks of the occurred.

4. I worked as a waiter at the Marriott Green Café restaurant located at 3 World Trade Center on 9/11. My shift began that day at 5:45 a.m. The restaurant typically serves breakfast to a large number of people each morning and the venue included a beautiful view of the rest of the World Trade Center area.

5. When the first passenger jet struck the North Tower, I had been in the dining room area of the restaurant. Glass shattered and everyone panicked and started running to avoid the shards of glass falling from the ceiling. Steel beams, airplane parts, and cement debris began

falling on top of the restaurant, which was located less than one hundred yards from the North and South Towers.

6. The falling debris and glass slammed into me, and I suffered injuries to my neck, lower back, right wrist/hand, my right hip, and my right elbow.

7. As I quickly tried to take cover from the falling debris, I watched in horror as a beam fell on a restaurant customer, crushing and killing him instantly. I then watched in horror as people jumped out of the North Tower to their deaths to avoid the fire in the building. I saw over thirty people jumping or falling to their deaths during this time, and these images haunt me to this day.

8. Because of the debris, soot, and dust that began to fill the air around me, I had little sense of where I was and where I needed to go to escape the carnage. Literally, there were body parts falling all around me at this point in time.

9. I finally exited 3 World Trade Center onto the street level, but I saw that the road had become impassable due to the cement, building debris, and multiple wrecked vehicles that had piled up in the area. A crowd of people trying to escape the building then knocked me to the ground and trampled over me, and I suffered additional injuries to my neck, back, and arm.

10. After I rose back to my feet, I ran to the American Express building to escape the chaos near the North Tower. I then called my mother to tell her that I had survived the collision of the first passenger jet with the North Tower. At that time, the second airplane struck the South Tower and I felt like my heart had fallen into my stomach. As the fireball from the second airplane exploded into the South Tower, I saw the mass hysteria and carnage near the North and South Towers. I heard the screams of the victims and I watched helplessly as people were trying to save themselves. I will never forget the horrible sights and sounds that I experienced on 9/11.

11. As I eventually escaped the area, I watched in horror as the South Tower and then the North Tower collapsed. I walked across the Manhattan Bridge and finally made it home after being in the area of the carnage at Ground Zero for approximately two or three hours.

12. As a result of these terrorist attacks, I suffered the following specific physical injuries: a cervical sprain in my neck, a lumbar sprain in my lower back, a right elbow injury that led to tendinitis, a left hip injury, and a significant sprain of my right wrist. Further, my right wrist injury led to the development of carpal tunnel syndrome. Due to my numerous injuries from 9/11, I did not return to work for over a year.

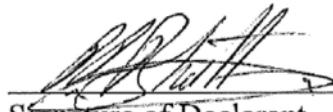
13. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks. This act of evil changed my life and the life of my family forever. After my experiences on 9/11, my doctors have also specifically diagnosed me as having PTSD. September 11, 2001, was a horrible day and I will never forget what I saw and heard.

14. I sought medical attention for my physical and emotional injuries immediately after the events of 9/11. Attached as Exhibit C to this Declaration is a true and correct copy of my select, relevant medical records related to the treatment that I received for my physical and emotional injuries following these terrorist attacks.

15. I previously pursued a claim (Claim Number VCF 212-007000) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 7th day of January, 2020.



Signature of Declarant – Prakash Bhatt

**EXHIBITS
FILED
UNDER SEAL
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